

Message

From: Fondahl, Lauren [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=8FCC41D8B83844B3B5483FE20B153452-LFONDAHL]
Sent: 11/25/2015 8:31:32 PM
To: Mitschele, Becky [Mitschele.Becky@epa.gov]; Webb, Steven J. [Steven.Webb@Waterboards.ca.gov]
Subject: FW: Question on the General Order

I checked with Johnny, and apparently the General Order does **not** cover injection of liquid sludge. One option for Las Virgenes would be to incorporate the language from the General Order into a WDR (the General Order contains the 40 CFR 503 requirements and a few additional requirements regarding distances to wells, etc) and modify it as needed for sub-surface injection. We can discuss more next week.

Lauren

From: Gonzales, Johnny [mailto:Johnny.Gonzales@waterboards.ca.gov]
Sent: Wednesday, November 25, 2015 11:26 AM
To: Fondahl, Lauren <Fondahl.Lauren@epa.gov>
Subject: RE: Question on the General Order

Hello Lauren. The Biosolids Land Application General Order does not cover subsurface injection of liquid sludge. A WDR would need to be obtained by the discharger/land applier.
take care,
johnny g.

From: Fondahl, Lauren [Fondahl.Lauren@epa.gov]
Sent: Wednesday, November 25, 2015 8:48 AM
To: Gonzales, Johnny [Johnny@Waterboards]
Subject: Question on the General Order

Hi Johnny,

Is land application of liquid sludge by subsurface injection covered under the General Order?

Las Virgenes has an expired WDR allowing subsurface injection. They haven't done this for years, as they compost their biosolids, but would like to renew the WDR as an option if they need to shut down their compost facility for maintenance. They would be injecting the sludge from their anaerobic digesters without dewatering. They have a current WDR for using their effluent on the fields in question.

The only other POTWs I recall in California that injected liquid sludge are Lodi and Eureka, but both had individual WDRs, and neither is currently injecting.

Thanks,

Lauren

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